

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

BONNIE GEORGE, ED MCKINZIE,)
TIM WORSTEL, CEDAR DERAPS,)
CASEY WASSER AND TAMMY VOLKART,)
vs.)
POWERCET CORPORATION, GAS)
TECHNOLOGY INSTITUTE (GTI), OMEGA)
FLEX, INC., WARD MANUFACTURING, LLC,)
AND TITEFLEX CORPORATION,)

Case No.: 2:16-CV-04056-MDH

**STIPULATED MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE
PLEADING AS TO DEFENDANT WARD MANUFACTURING, LLC AND
SUGGESTIONS IN SUPPORT**

COMES NOW Defendant Ward Manufacturing, LLC (“Ward”), by its undersigned attorneys of record, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), and, for good cause shown, moves the Court for its Order extending the time within which Ward may file its responsive pleading for a period of twenty (20) days after all Defendants have been served with process or alternatively, based on a briefing schedule agreed to by the parties and ordered by the Court.

1. Plaintiffs filed this action as a class action suit against five named Defendants including Ward Manufacturing, LLC on or about February 10, 2016.
2. Summons was issued to each Defendant and service was made on Ward, but to date no other Defendant has been served.
3. Since this action is filed as a class action with multiple defendants, it is anticipated that a coordinated schedule for briefing for all parties as it relates to responsive pleadings will need to be discussed by the parties and the Court.

4. Plaintiffs have been consulted regarding this motion by Ward and have agreed to this motion and the times requested herein.

5. A proposed Order will be submitted to the Court.

WHEREFORE, for the above and foregoing reasons, Defendant Ward Manufacturing, LLC respectfully moves the Court for its Order extending the time within which Ward may file a responsive pleading to the class action Complaint until on or about twenty (20) after the last Defendant has been served with summons or, alternatively, on a schedule to be entered by the Court for responsive pleadings by all Defendants.

Respectfully submitted,

**FOLAND, WICKENS, EISFELDER,
ROPER & HOFER, P.C.**

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***Attorneys for Defendant
Ward Manufacturing, LLC***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day of March 2016, a copy of the foregoing was electronically filed with the CM/ECF system of the United States District Court for the Western District of Missouri which sends notice to the following counsel of record via e-mail:

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